

June 16, 2014

Mr. Carl Daly  
Attn: Mike Owens  
U. S. EPA  
1595 Wynkoop Street  
Denver, CO 80202-1129

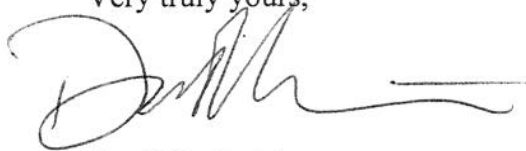
Dear Mr. Owens:

*Re: Request for Substantiation of Business Confidentiality Claim*

This letter responds to your request dated May 29, 2014 for the Substantiation of Business Confidentiality Claim ("CBI") on certain materials submitted to EPA. Deseret has reviewed its claim for CBI and has withdrawn CBI Claim for some of the documents. The revised status is depicted in the attached spreadsheets. Also attached is information pertinent to Deseret's claims.

If you have any questions please do not hesitate to contact me.

Very truly yours,



David F. Crabtree  
Vice President and General Counsel

Description of Information, Scope of Material Covered by CBI Claim (pages, inclusions):

SEE ATTACHED LIST

1. Period of Time to be maintained Confidential.

*Description: Deseret believes the CBI designation for this information will continue until the physical configuration and design details of the Bonanza Generator, Boiler and ancillary equipment is substantially modified, which is not currently contemplated at any time in the future.*

2. Reason for Period Requested in No. 1 Above.

*Deseret Requests the Indefinite Period for CBI designation due to the sensitive and proprietary nature of specific engineering details that would pose potential competitive harm to Deseret if it were disclosed publicly. For detailed description of potential harm of public disclosure, see item No. 7 below.*

3. Measures Taken to Preserve Confidentiality.

*Access to detailed design drawings is strictly limited to a "need to know" basis among qualified personnel of Deseret's operational staff and/or provided only upon specific assurance of adequate protection against public disclosure and/or unrelated or unapproved use by vendors, suppliers, and contractors ("Vendors"). Vendors receiving or reviewing detailed design drawings are held to use those drawings, and information contained therein, strictly for the narrow purpose of preparing quotations, or performing work under contract on relevant portions of the equipment.*

4. Availability of Information via Internet or other Public Sources.

*The information is not publicly accessible via internet or other non-controlled (i.e., password restricted) means.*

5. Public Means of Access to Information.

*The information is provided, if at all, to limited Vendors or others only upon affirmative approval by authorized corporate officers or other management personnel at Deseret.*

6. Governmental Determination of CBI with respect to Information.

*Deseret does not know the extent to which any government authority has, in the past, rendered a decision as to the Confidential nature and status of the information. Some information included in the subject description is subject to court-ordered protective order in litigation entitled Deseret vs. PacifiCorp Case No. : 2:10-cv-159 (D. UT)*

1-9-14 email.pdf

2-7-14 email.pdf

BCES-NRECA CCEMC Full Proposal Final 2 6 14 Final.pdf

7. Competitive and Other Harm Likely to Result from Public Disclosure.

*Disclosure of the Identified CBI would result in competitive harm and/or disadvantage to Deseret including, but not limited to:*

- Disadvantage in negotiating arm's length market-based prices for long-term sales of wholesale power and energy produced from Bonanza. The future ability, and/or cost of modifications to the plant and equipment of Bonanza are the subject of and influence the acceptable future price to be included in establishing long-term market based bilateral contract arrangements. Information of a detailed nature concerning specific design, design arrangement, and boiler configuration provides substantial benefit in estimating or projecting future costs of this nature, and provides benefit to possessing such information in the negotiation process;*
- Disadvantage in negotiating coal or other fuel supply arrangements (temporary or periodic) with arms' length suppliers.*
- Disadvantage in negotiating and administering cost-based and market-based agreements for electricity sales arising from disclosure of information tending to inform the recipient concerning Deseret's outlook for natural gas prices, market electricity prices and trends, costs of conversion of primary fuel or dual fuel alternatives from coal to natural gas or other fuel alternatives; Deseret is not required to disclose such information publicly.*
- Disadvantage in market clearing auction processes where detailed coal quality, detailed coal consumption, heat rate information, and similar data if available to other market auction participants would result in distorted and disadvantaged bidding criteria to the economic disadvantage of Deseret.*
- Disadvantages in negotiating with and among competitors for goods and services for maintenance, repair, replacement, and/or other work to be performed at Bonanza, including without limitation, knowledge obtained by one competitor of the identity of competing enterprises with whom or from whom Deseret has obtained information or entered into discussions for same or similar item(s).*

- *Disadvantage in negotiating arm's length goods and services for plant maintenance, repair, and inventory purchasing for spares/wearable items.*
- *Disadvantage in competitive bidding with competing utilities for ancillary services such as long-term energy backup (reserve) services, etc.*
- *Disadvantage in administering time and material contracts for plant maintenance and similar services;*
- *Disadvantage in negotiating commercial terms for sales of surplus equipment, spares, and disposal of obsolete inventory items.*

*In addition, Deseret asserts and believes that information contained in the subject materials constitutes sensitive detailed information concerning plant layout and identification of key buildings/equipment locations that would, if disclosed publicly, expose Deseret and the public to unnecessary and dangerous risk of potential attack, including violent attack, against electric system infrastructure. Risk of such attacks are of heightened concern given recent developments involving electric system infrastructure.*

8. Is Information Being Submitted Voluntarily or Mandated by EPA?

*The subject information was submitted in response to mandatory demand for information issued by EPA pursuant to Section 114 of the Clean Air Act.*

9. Effect of Availability to EPA of Similar Information in the Future

*Deseret cannot predict what effect public disclosure will or may have in Deseret's future collection, storage, or information retention policy and/or procedures in the future.*

10. Trade Secret Status of Information. The Information Identified above is considered by Deseret to constitute a Trade Secret, as further described below.

*Note: Deseret believes a Trade Secret to include any information that:*

- Is not generally known to the public;
- Confers some sort of economic benefit on its holder; and
- Is the subject of reasonable efforts to maintain its secrecy.

With respect to the foregoing elements, Deseret refers to its responses in Item No. 4 (Information is not Generally known to public); Item No. 7 (value of secrecy/harm of public disclosure; and Item No. 3 (Measures taken to safeguard secrecy) above as substantiation of claim for trade secret status.

11. Other Relevant Considerations.

*The following item(s) is subject to a non-disclosure Agreement to which Deseret is bound and which prohibits disclosure to third parties:*

Babcock and Wilcox Proposal for Combustion and Pulverizer Improvement Jan 2004.pdf
Babcock and Wilcox Proposal P010917 Cover Letter - LNB Retrofit and OFA Addition Sept 2011.pdf
Fuel Tech Deseret Bonanza Unit 1 SNCR Demonstration Proposal 13-D-093 June 2013.pdf
Fuel Tech Deseret Bonanza Unit 1 SNCR Demonstration Proposal 13-D-093 June 2013.pdf
Fuel Tech Information Request CUS-EST200906-ALL Systems June 2013.pdf
Fuel Tech Low and High Sulfur Values - e-mail Deseret Power.pdf
Fuel Tech RE RFG - Combustion System Site Visiti Request e-mail.pdf
Info to FT 72-36933-001 Coal Ultimate Ash Fusion Elements 12 16 08.pdf
Info to FT Bottom Ash 99 Analysis.pdf
Info to FT Bottom Ash Analysis.pdf
Babcock and Wilcox Proposal for Combustion and Pulverizer Improvement Jan 2004.pdf
Babcock and Wilcox Proposal P010917 Cover Letter - LNB Retrofit and OFA Addition Sept 2011.pdf
Fuel Tech Deseret Bonanza Unit 1 SNCR Demonstration Proposal 13-D-093 June 2013.pdf
1-9-14 email.pdf
2-7-14 email.pdf
BCES-NRECA CCEMC Full Proposal Final 2 6 14 Final.pdf
Babcock Power Proposal Combustion Optimization Project, March 2004.pdf

## ITEMS PRODUCED

DESCRIPTION:	RELATES TO:	Confidential Claim	Revised Confidential Claim	Scope (Pages)
102-01-016 STEAM GENERATOR GENERAL ARRANGEMENT CROSS SECTIO.pdf	1A	Confidential	Confidential	all
DD00 POWER PLANT CROSS SECTION.pdf	1A	Confidential	CBI Claim Withdrawn	
Fastlook - 102-01-015 STEAM GENERATOR GENERAL ARRANGEMENT FRONT CROSS SECTIO.pdf	1A	Confidential	Confidential	all
Fastlook - A018 TRANSVERSE SECTION-BOILER AREA .pdf	1A	Confidential	CBI Claim Withdrawn	
FastLook - DD06A BF-BOILER FUEL.pdf	1A	Confidential	Confidential	all
FastLook - GA12 BOILER AREA GROUND FLOOR PLAN EL 5028-0.pdf	1A	Confidential	Confidential	all
FastLook - GA13 BOILER AREA PLATFORM EL 5054-3.pdf	1A	Confidential	Confidential	all
FastLook - GA14 BOILER AREA PLATFORM EL 5068-5.pdf	1A	Confidential	Confidential	all
FastLook - GA15 BOILER AREA PLATFORM EL 5076-7.pdf	1A	Confidential	Confidential	all
FastLook - GA16 BOILER AREA PLATFORM EL 5085-11.pdf	1A	Confidential	Confidential	all
FastLook - GA17 BOILER AREA PLATFORM EL 5098-5.pdf	1A	Confidential	Confidential	all
FastLook - GA18 BOILER AREA PLATFORM EL 5109-11.pdf	1A	Confidential	Confidential	all
FastLook - GA19 BOILER AREA PLATFORM EL 5123-6.pdf	1A	Confidential	Confidential	all
FastLook - GA20 BOILER AREA PLATFORM EL 5133-0.pdf	1A	Confidential	Confidential	all
FastLook - GA21 BOILER AREA FAN PLATFORM EL 5141-8.pdf	1A	Confidential	Confidential	all
FastLook - GA22 BOILER AREA PLATFORM EL 5150-9.pdf	1A	Confidential	Confidential	all
FastLook - GA23 BOILER AREA PLATFORM EL 5159-3.pdf	1A	Confidential	Confidential	all
FastLook - GA24 BOILER AREA PLATFORM EL 5167-9.pdf	1A	Confidential	Confidential	all
FastLook - GA25 BOILER AREA PLATFORM EL 5176-3.pdf	1A	Confidential	Confidential	all
FastLook - GA26 BOILER AREA PLATFORM EL 5187-9.pdf	1A	Confidential	Confidential	all
FastLook - GA27 BOILER AREA INTAKE LOUVER PLATFORM EL 5195-5.pdf	1A	Confidential	Confidential	all
FastLook - GA28 BOILER AREA PLATFORM EL 5213-0.pdf	1A	Confidential	Confidential	all
FastLook - GA29 BOILER AREA RELIEF LOUVER PLATFORMS EL 5222-4.pdf	1A	Confidential	Confidential	all
FastLook - GA30 BOILER AREA PLATFORM EL 5236-9.pdf	1A	Confidential	Confidential	all
FastLook - GA31 BOILER AREA ROOF PLAN.pdf	1A	Confidential	Confidential	all
FastLook - GA58 PLANT GENERAL ARRANGEMENT.pdf	1A	Confidential	CBI Claim Withdrawn	
FastLook - GA59 TURBINE AREA TRANSVERSE SECTION.pdf	1A	Confidential	CBI Claim Withdrawn	
FastLook - GA60 BOILER AREA TRANSVERSE SECTION.pdf	1A	Confidential	CBI Claim Withdrawn	
FastLook - YGA1 DETAILED YARD GENERAL ARRANGEMENT.pdf	1A	Confidential	Confidential	all
FastLook - YGA2 DETAILED YARD GENERAL ARRANGEMENT.pdf	1A	Confidential	Confidential	all
reference to previously supplied documents.pdf	1A	Confidential	CBI Claim Withdrawn	
1B-Rated MW Capacity (1995-2014).pdf	1B	Confidential	CBI Claim Withdrawn	
Unit Rating 1999 (Page 16).pdf	1B	Confidential	CBI Claim Withdrawn	
WSCC Letter Bonanza 1 Rating.pdf	1B			
1D-Annual Heat Rate (1995 - 2014).pdf	1D	Confidential	Confidential	all
Upper furnace temperatures daily.pdf	1E	Confidential	Confidential	all



DESCRIPTION:	RELATES TO:	Confidential Claim	Revised Confidential Claim	Scope (Pages)
IF-Coal characteristics (1995 - 2014).pdf	IF	Confidential	Confidential	all
IG-Coal & Fuel Oil Consumption (1995 - 2014).pdf	IG	Confidential	Confidential	all
Advanced Burner 1997 Report after installation.pdf	1H	Confidential	CBI Claim Withdrawn	
Air Flow Science Meeting agenda combustion project Sept 2005.pdf	1H	Confidential	Confidential	all
Air Flow Science project Final Design Winbox L-04-DG3-SA03 May 2004 (1).pdf	1H	Confidential	Confidential	all
Air Monitor project submittal PA Flow Dec 2006.pdf	1H	Confidential	Confidential	all
Babcock and Wilcox AireJet Burners Brochure E1013195 2008.pdf	1H			
Babcock and Wilcox Burners 4Z Brochure E1013177 2000.pdf	1H			
Babcock and Wilcox Proposal for Combustion and Pulverizer Improvement Jan 2004.pdf	1H	Confidential	Confidential	all
Babcock and Wilcox Proposal P010917 Cover Letter - LNB Retrofit and OFA Addition Sept 2011.pdf	1H	Confidential	Confidential	all
Babcock Power Burner Brochure 2011.pdf	1H			
Babcock Power Burner Brochure 2014.pdf	1H			
Burns and McDonnell FW e-mail Deseret Bonanza NOx.pdf	1H	Confidential	Confidential	all
Burns and McDonnell Low NOx Study Proposal Letter June 2013.pdf	1H	Confidential	Confidential	all
Deseret e-mail FW NOx.pdf	1H	Confidential	Confidential	all
Deseret Gas addition to Bonanza Memo April 2001.pdf	1H	Confidential	Confidential	all
Energy and Environmental Research corp New Burner Proposal, 1 Oct 1996.pdf	1H	Confidential	Confidential	all
Energy and Environmental Research corp Proposal, 2 1996.pdf	1H	Confidential	Confidential	all
Energy and Environmental Research corp Proposal, 3 1996.pdf	1H	Confidential	Confidential	all
Energy and Environmental Research corp Proposal, 4 1996.pdf	1H	Confidential	Confidential	all
Energy and Environmental Research corp Proposal, 5 1996.pdf	1H	Confidential	Confidential	all
Energy and Environmental Research corp Proposal, 6 1996.pdf	1H	Confidential	Confidential	all
Foster Wheeler FW NOx info e-mail.pdf	1H	Confidential	Confidential	all
Fuel Tech 109108_SNCR Brochure.pdf	1H			
Fuel Tech 109225_LNB Brochure.pdf	1H			
Fuel Tech 109230_OFA Brochure.pdf	1H			
Fuel Tech Deseret Bonanza Unit 1 SNCR Demonstration Proposal 13-D-093 June 2013.pdf	1H	Confidential	Confidential	all
Fuel Tech Information Request CUS-EST200906-ALL_Systems June 2013.pdf	1H	Confidential	Confidential	all
Fuel Tech Low and High Sulfur Values - e-mail Deseret Power.pdf	1H	Confidential	Confidential	all
Fuel Tech RE RFG - Combustion System Site Visiti Request e-mail.pdf	1H	Confidential	Confidential	all
Fuel Tech SNCR Demo Presentation Meeting Handout Version June 2013.pdf	1H	Confidential	Confidential	all
Fuel Tech Technology Spectrum Brochure.pdf	1H			
Fuel Tech Technology and SNCR Demo Meeting Agenda June 2013.pdf	1H	Confidential	Confidential	all
Fuel Tech-109218_ASCR brochure.pdf	1H			
Fuel Tech -109602_Modeling Brochure.pdf	1H			
Info to FT 72-36933-001 Coal Ultimate_Ash Fusion_Elements_12_16_08.pdf	1H	Confidential	Confidential	all
Info to FT Bottom Ash 99 Analysis.pdf	1H	Confidential	Confidential	all
Info to FT Bottom Ash Analysis.pdf	1H	Confidential	Confidential	all

DESCRIPTION:	RELATES TO:	Confidential Claim	Revised Confidential Claim	Scope (Pages)
Rosemount Proposal for CO Monitor, Feb 1997.pdf	1H	Confidential	Confidential	all
SAS Global Burner Brochure 2010.pdf	1H			
STORM P10-14600-01-1594 Rev 3 Pulverizer Performance Kit and Testing Proposal Oct 2010.pdf	1H	Confidential	Confidential	all
STORM P10-14600-01-1710 MPS 89 Pulverizer Performance Parts Proposal Nov 2010.pdf	1H	Confidential	Confidential	all
STORM P10-14600-01-1923 Pulverizer Performance Parts for MPS MBF Mills Proposal July 2011.pdf	1H	Confidential	Confidential	all
Storm Service Report Pulverizer Tests rev1 April May 2011.pdf	1H	Confidential	Confidential	all
Thermo environmental Proposal for CO Monitor, Feb 1997.pdf	1H	Confidential	Confidential	all
Zolo Tech BOSS Ottumwa Presentation EUEC Feb 2014.pdf	1H	Confidential	CBI Claim Withdrawn	
Babcock and Wilcox Proposal for Combustion and Pulverizer Improvement Jan 2004.pdf	2A(i)	Confidential	Confidential	all
Babcock and Wilcox Proposal P010917 Cover Letter - LNB Retrofit and OFA Addition Sept 2011.pdf	2A(i)	Confidential	Confidential	all
Burns and McDonnell FW e-mail Deseret Bonanza NOx.pdf	2A(i)	Confidential	Confidential	all
Fuel Tech Deseret Bonanza Unit 1 SNCR Demonstration Proposal 13-D-093 June 2013.pdf	2A(i)	Confidential	Confidential	all
1-9-14 email.pdf	2B	Confidential	Confidential	all
1-18-12 email.pdf	2B	Confidential	Confidential	all
2-7-14 email.pdf	2B	Confidential	Confidential	all
BCES-NRECA CCEMC Full Proposal Final 2 6 14 Final.pdf	2B	Confidential	Confidential	all
Board Strategic Planning Meeting 1-26-12.pdf	2B	Confidential	Confidential	all
Bonanza Alternative Cases Results v2.pdf	2B	Confidential	Confidential	all
comparison.pdf	2B	Confidential	Confidential	all
cost estimate.pdf	2B	Confidential	Confidential	all
Deseret Power's Bonanza Power Plant.pdf	2B	Confidential	Confidential	all
Fuel Oil Usage.pdf	2B	Confidential	Confidential	all
Fuel Oil.pdf	2B	Confidential	Confidential	all
FW_Deseret burner estimates.pdf	2B	Confidential	Confidential	all
Gas and Market Price Forecasts.pdf	2B	Confidential	Confidential	all
Generation Costs 1-24-12pdf	2B	Confidential	Confidential	all
Green Coal Solutions - Data Summary - Technical 2014 - Bradshaw.pdf	2B	Confidential	CBI Claim Withdrawn	
letter of support to Bobby Chen for Alberta CCEMC 01022014.pdf	2B	Confidential	CBI Claim Withdrawn	
letter of support to Walter Fuqua for Alberta CCEMC.pdf	2B	Confidential	CBI Claim Withdrawn	
Natural Gas at Bonanza explanation.pdf	2B	Confidential	Confidential	all
Natural Gas Installation at Bonanza.pdf	2B	Confidential	Confidential	all
Natural Gas Retrofit.pdf	2B	Confidential	Confidential	all
Natural Gas Service for Bonanza linda hamilton.pdf	2B	Confidential	Confidential	all
Natural Gas Service for Bonanza.pdf	2B	Confidential	Confidential	all
Notes on bringing natural gas to Bonanza.pdf	2B	Confidential	Confidential	all
Production data of on site gas well.pdf	2B	Confidential	Confidential	all
Propane deliveries.pdf	2B	Confidential	Confidential	all
QPC Shippers List.pdf	2B	Confidential	CBI Claim Withdrawn	



DESCRIPTION:	RELATES TO:	Confidential Claim	Revised Confidential Claim	Scope (Pages)
RE_Natural gas service brent turner.pdf	2B	Confidential	Confidential	all
RE_Natural gas service.pdf	2B	Confidential	Confidential	all
RE_Questions about using natural gas at Deseret.pdf	2B	Confidential	Confidential	all
RE_thanks.pdf	2B	Confidential	CBI Claim Withdrawn	
reference to previously supplied documents.pdf	2B	Confidential	CBI Claim Withdrawn	
Request for proposal for natural gas supplier.pdf	2B	Confidential	CBI Claim Withdrawn	
Strole Neural Network Emails.pdf	2B	Confidential	Confidential	all
Summary.pdf	2B	Confidential	Confidential	all
Why partner with BCES and MMI on bids to Alberta ccemc 01042014.pdf	2B	Confidential	CBI Claim Withdrawn	

## ITEMS PRODUCED

DESCRIPTION:	RELATES TO:	CLAIM OF CBI	Revised Claim	Pages
1D-Annual Heat Rate (1995-2014)-UPDATED.pdf	1D	NO		
1G-Coal & Fuel Oil Consumption (1995-2014)-UPDATED.pdf	1G	NO		
Advanced Burner Technology Proposal Opti-Flow Burners, Nov 1996.pdf	1H	NO		
Babcock and Wilcox Proposal Combustion Optimization Project, Feb 2004.pdf	1H	YES	YES	all
Babcock Power Proposal Combustion Optimization Project, March 2004.pdf	1H	YES	YES	all
Burns and McDonnell Mill Performance Test Report Results, Combustion Optimization, Dec 2003.pdf	1H	NO		
Burns and McDonnell Proposal, Combustion Optimization and Burner Tuning, Jan 2003.pdf	1H	NO		
Forney Brochure Burner Optimization Products, Sept 1997.pdf	1H	NO		
RJM Proposal for Coal Flame Stabilization 1, October 1996.pdf	1H	NO		

Note: CBI designation justification to follow separately